

**Exhibit 31**

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF MICHIGAN  
3

4 JOHN PLAINTIFF,  
5 Plaintiff,  
6

7 vs. Case No. 2:20-cv-11718-GAD-DRG  
8

9 WAYNE STATE UNIVERSITY,  
10 WAYNE STATE UNIVERSITY  
11 SCHOOL OF MEDICINE,  
12 NICOLINA CAMAJ, MARGIT CHADWELL,  
13 MATTHEW JACKSON, RICHARD S. BAKER,  
14 R. DARIN ELLIS, in their individual  
15 and official capacities,  
16 jointly and severally,  
17 Defendants.  
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19  
20 VIDEOCONFERENCE DEPOSITION  
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22 DEPONENT: MATTHEW JACKSON, Ph.D.

23 TIME: 9:59 a.m.

24 DATE: Friday, November 19, 2021

25 REPORTER: Denise M. Kizy, RPR, CRR, CSR-2466

JOHN PLAINTIFF vs WAYNE STATE UNIVERSITY  
JACKSON, MATTHEW 11/19/2021

Job 16618  
70..73

<p style="text-align: right;">Page 70</p> <p>1 Q. Do you recall that one of the charges 2 related to personal and sexually suggestive 3 photographs? 4 MR. PORTER: Objection; form. 5 <b>THE WITNESS: No, not as part of</b> 6 <b>this, no. I don't recall any sexually</b> 7 <b>suggestive photographs, no.</b> 8 MR. FLORES: Okay. If we could have 9 Exhibit C posted again, and if you would scroll 10 between pages 3 and 4, and I would ask the 11 doctor if he would go ahead and read the 12 complaint through to himself and then let me 13 know when he is done. 14 MR. PORTER: Bob, can I make a 15 suggestion? 16 MR. FLORES: Sure. 17 MR. PORTER: If you upload this, we 18 will print it out here in hard copy. 19 MR. FLORES: Okay. 20 MR. PORTER: Put it in the chat and 21 we'll print it out for him and he can read it, 22 you know. 23 MR. FLORES: Yeah, sure. That would 24 be great. 25 Derek, can you do that?</p>	<p style="text-align: right;">Page 72</p> <p>1 those are -- that's a summary of the testimony 2 that was received by your committee when Amanda 3 Burton testified; is that correct? 4 MR. PORTER: Objection; form. 5 <b>THE WITNESS: This looks like it's</b> 6 <b>the minutes from the Professionalism hearing.</b> 7 BY MR. FLORES: 8 Q. Can you tell me who took those 9 minutes? 10 <b>A. That would have been Erika Roberts.</b> 11 Q. All right. So is your memory 12 refreshed with respect to the sexually 13 suggestive pictures that I asked you about 14 previously? 15 <b>A. I see that Erika documented that he</b> 16 <b>was trying to get photos of her and there was</b> 17 <b>some intimate photos, but I don't recall there</b> 18 <b>being the discussion in the committee that there</b> 19 <b>was like a sexual element of it. In general, he</b> 20 <b>just wanted access to all her accounts.</b> 21 I do recall the conversation between 22 her and her photographer, because it was her 23 photographer who said there's somebody trying to 24 contact me, but in the deliberations of the 25 committee I don't recall that being a focus of</p>
<p style="text-align: right;">Page 71</p> <p>1 EXHIBIT TECHNICIAN: Yes. That's in 2 the chat now. 3 MR. PORTER: Just one second. 4 I will just show that to him so he 5 can see it. 6 <b>THE WITNESS: Exhibit C?</b> 7 BY MR. FLORES: 8 Q. Yes. If you'd take a look at pages 3 9 and 4. 10 <b>A. Okay.</b> 11 MR. FLORES: All right. And then if 12 you would publish Exhibit E for Dr. Jackson. 13 MARKED FOR IDENTIFICATION: 14 EXHIBIT E 15 11:51 a.m. 16 MR. FLORES: If you would go down 17 to -- you can stop right there. 18 BY MR. FLORES: 19 Q. And, Dr. Jackson, if you would just 20 take a moment and read through that page, and 21 then go on to -- I think it goes on a little bit 22 further as well below. 23 <b>A. Okay.</b> 24 <b>Okay.</b> 25 Q. So the last document, Exhibit E,</p>	<p style="text-align: right;">Page 73</p> <p>1 <b>the nature of the pictures. It was just that</b> 2 <b>because there was a number of things that he</b> 3 <b>kept contacting Amanda about over time that I</b> 4 <b>don't recall that being a focus.</b> 5 Q. But you recall -- okay. 6 But it's true, isn't it, that she did 7 testify to the fact that nude photographs were 8 the subject of someone's attempt to obtain them; 9 is that right? 10 MR. PORTER: Objection; form. 11 <b>THE WITNESS: Yes, she did mention</b> 12 <b>there were intimate and nude photographs that</b> 13 <b>someone was asking for.</b> 14 BY MR. FLORES: 15 Q. And that testimony made it to the 16 Professionalism Committee; is that correct? 17 <b>A. Yes.</b> 18 Q. Did you make any effort to 19 investigate that claim? 20 <b>A. No.</b> 21 Q. Did you ever do any investigation on 22 your own of her social media sites or her social 23 media pages? 24 <b>A. No, I did not.</b> 25 Q. Did you ask anyone on your staff to</p>